

August 19, 2019

## **Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> St., SW, Room TW-A325 Washington, DC 20554

Re: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support,

WC Docket No. 09-197

Dear Ms. Dortch:

On August 16, 2019, Dow Draper, Charles McKee, and I of Sprint met, in separate meetings, with Nirali Patel of Chairman Pai's office; Trent Harkrader, Ryan Palmer, Jodie Griffin, Nicholas Page and Nathan Eagan of the Wireline Competition Bureau; Joseph Calascione of Commissioner Carr's office; and Alisa Valentin of Commissioner Starks' office, to discuss Lifeline minimum service standards (MSS). Sprint urged the Commission to grant a pending waiver petition to temporarily pause the Lifeline MSS at existing levels. Sprint noted that service offers to non-Lifeline customers with data allowances of 2GB and higher all have a monthly service charge. We noted that in prior cases in which we tested the impact of Lifeline end user charges, the participation rate has been extremely low, and expressed our concern that increasing the Lifeline data MSS to 8.75GB would necessitate an end user charge, which would lead to a very sharp drop in Lifeline customers. Sprint also noted that our Lifeline customer's average data usage is significantly below the current allowance, indicating that a 2GB allowance is sufficient to meet essential data requirements. Sprint's comments were consistent with points raised in its July 31, 2019 comments filed in the above-captioned proceedings.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

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Sincerely,

/s/Norina T. Moy

Norina T. Moy Director, Government Affairs

Cc: Nirali Patel

Joseph Calascione Alisa Valentin Trent Harkrader Ryan Palmer Jodie Griffin Nicholas Page Nathan Eagan